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July 17, 2006

Hon. Kenneth M. Karas  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

BY ECF

RE: United States v. Shyne, et. al., including Roberto Montgomery, 05 Cr 1067 (KMK)

Your Honor:

I am writing to seek approval for a minor bail modification to permit my client to travel on Wednesday, July 19, 2006 to Hartford, Connecticut, for the day.

The purpose is to attend the immigration court hearing of his sister, Cynthia Montgomery, who is in custody and in removal proceedings in the Immigration Court located at 450 Main Street in Hartford, Connecticut. This may be the last opportunity he will have to see her for a long time since she is likely to be deported.

I have spoken to AUSA Danya Perry, and she has no objection to this request. I have called Mr. Montgomery's Pre-Trial Services Officer, Natasha Ramisar, and I am awaiting her position on the issue. Since this involves travel within 48 hours I am proceeding to file this letter without waiting for her response.

Thank you.

Sincerely,

/s/ Thomas H. Nooter  
Thomas H. Nooter  
Attorney for Defendant

cc: AUSA Danya Perry, by ECF  
PTSA Officer Natasha Ramisar, by mail